



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

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*271 Cadman Plaza East  
Brooklyn, New York 11201*

April 16, 2020

**By ECF**

Honorable Rachel P. Kovner  
United States District Judge  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: *Chunn, et al. v. Warden Derek Edge,*  
Civil Action No. 20-cv-1590 (Kovner, J.) (Mann, M.J.)

Dear Judge Kovner:

As an addendum to Respondent's letter yesterday respectfully requesting: (1) a three-business day extension, until April 20, to supplement his response (if any) regarding soap purchases and deliveries; and (2) a three-business day extension, until April 20, to provide further information regarding Petitioners' request for production of sick-call requests for medical care (Dkt. No. 47); Respondent respectfully notes that Petitioners consent to these requests. Petitioners, however, noted that they do not want the extension to cause any delays to the current discovery schedule. Respondent respectfully submits that the instant extension requests will not affect any other deadline in this matter.

Respondent again sincerely apologizes for its error in not including Petitioners' position in its original application yesterday.

Respondent thanks the Court for its consideration of this matter.

Respectfully submitted,

RICHARD P. DONOGHUE  
United States Attorney

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cc: The Honorable Roanne L. Mann, U.S. Magistrate Judge  
All Counsel of Record (by ECF)